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8 September 1997

Mr. Paul Steadman, M.P.H.
U.S. EPA Region 5
77 West Jackson Boulevard
SE-5J
Chicago, IL 60604

EPA Region 5 Records Ctr.



247441

RE: Administrative Order of Consent: GHR Foundry: Dayton, Ohio
Monthly Progress Report
Report #4

Dear Mr. Steadman:

On behalf of our client, Mr. Raymond Carcione, President, Foundry Sales & Supply, Inc., and in accordance with the requirements of the Administrative Order of Consent for the GH&R Foundry Site, Roy F. Weston, Inc. (WESTON®) is submitting this monthly progress report describing field activity at the GHR Foundry Site, 400 Detrick Street, Dayton, Ohio. This report covers the month of August 1997.

Sampling and removal activities as described in the approved Revised Work Plan continued at the site throughout the month of August 1997. Activities were conducted per the approved revised schedule, followed the requirements of the site Sampling and Analysis Plan and Health and Safety Plan, and are described herein.

WESTON subcontractors participating in the removal activities this month include the following firms:

Laboratory Analyses - Waste Characterization
PCB/RCRA/Non-haz Waste Removal
Site Security

Intertek Testing Services, Inc. of Colchester, Vermont
Laidlaw Environmental Services, Inc. of Twinsburg, Ohio
Merchant Security Service, Inc. of Dayton, Ohio

Work Performed in August 1997

Site Security/Access Control

Site inspections, performed by Merchant Security Services, Inc. were terminated after the demolition debris, PCB wastes and RCRA wastes were removed.





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RCRA/TSCA/Non-hazardous Waste Sampling/Removal

Oily dirt and solids covering the floor of Plant G were analyzed by Intertek Testing Services for PCB and TCLP-lead. Results show PCBs at less than 50ppm, and TCLP-lead at less than 1ppm.

Oily dirt and solids covering the floor of the storage room in Plant G (Room G) were analyzed by Intertek Testing Services for PCBs. Results show a PCB concentration of 2380ppm.

Plant G debris, Room G debris, and drummed wastes were shipped to Laidlaw's disposal facilities on 1 August 1997. Approximately 700 gallons of non-regulated oil and water were sent to Laidlaw's Hilliard, Ohio facility. Approximately 12 drums of non-regulated Plant G debris, 36 empty drums, and 1 empty aboveground storage tank were shipped to Laidlaw's Greenbriar, Tennessee facility. Approximately 20 yards (11,000kg) of PCB debris were shipped in a covered rolloff box to Laidlaw's Twinsburg, Ohio facility. Approximately 9 drums (495 gallons) of ignitable liquids were sent to Laidlaw's Greenbriar, Tennessee facility.

A sample of a high viscosity petroleum-based substance (grease/caulk), discovered in the southeast portion of the site, was sampled for characterization analyses on 7 August 1997.

Oil and water was found to be leaking from a piece of equipment on the Plant H foundation on 14 July 1997. The impacted soil was loaded into a truck and sent as petroleum contaminated soil (PCS) to Petro Environmental, Inc. for treatment. A sample of the saturated material was sent to Intertek Testing Services, Inc. for PCB/TPH-DRO/BTEX analyses. Results show that the PCB concentration in the material was 72ppm. A composite sample was later collected from the soil. Results showed PCBs at less than 50ppm. Petro Environmental and EPA were notified of the results. WESTON recommended that the soil remain at the treatment facility for disposal.

Planned Activities

RCRA/TSCA/Non-hazardous Waste Removal

The two remaining drums of grease/caulk substance are expected to be removed by Laidlaw for disposal in early September. Waste classification and disposal will be based on results of samples analyzed by ITS laboratories.

Debris was collected and removed from the floor in areas of plant G where transformers and drums of oil were stored. Analytical results of debris samples indicate that Room G may require additional remedial attention in order to satisfy a 10 mg/100cm² PCB cleanup level for the site. Remedial activities in this area, and other areas, will be addressed under the Ohio Voluntary action program.



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The Draft Report for the former GH&R Foundry will be prepared and submitted to EPA within 60 days of the removal and disposal of the last two drums of wastes from the site.

If you have any questions regarding this notification, please contact me or Michael May at (513) 825-3440.

Very truly yours,

ROY F. WESTON, INC.

A handwritten signature in black ink, appearing to read "Bradford S. White".

Bradford S. White, Ph.D.
Senior Project Manager

BSW/mpm

Attachment

cc: Mr. Tom Buchan / OEPA
Mr. Jeffrey Cahn / U.S.EPA Region 5
Mr. Raymond Carcione / Foundry Sales & Supply, Inc.
Mr. Aaron Bulloff, Esq. / Kadish, Hinkel & Weibel
Mr. Dusty Hall / City of Dayton